

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, TYLER MAGILL, APRIL  
MUNIZ, HANNAH PEARCE, MARCUS  
MARTIN, NATALIE ROMERO, CHELSEA  
ALVARADO, and JOHN DOE

Plaintiffs,

v.

Civil Action No.: 3:17CV00072

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES ALEX  
FIELDS, JR., VANGUARD AMERICA,  
ANDREW ANGLIN, MOONBASE  
HOLDINGS, LLC, ROBERT “AZZMADOR”  
RAY, NATHAN DAMIGO, ELLIOTT  
KLINE a/k/a ELI MOSELEY, IDENTITY  
EVROPA, MATTHEW HEIMBACH, MATTHEW  
PARROTT a/k/a DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS, LEAGUE  
OF THE SOUTH, JEFF SCHOEP, NATIONAL  
SOCIALIST MOVEMENT, NATIONALIST  
FRONT, AUGUSTUS SOL INVICTUS,  
FRATERNAL ORDER OF THE ALT-KNIGHTS,  
MICHAEL “ENOCHE” PEINOVICH, LOYAL  
WHITE KNIGHTS OF THE KU KLUX KLAN,  
and EAST COAST KNIGHTS OF THE KU KLUX  
KLAN a/k/a EAST COAST KNIGHTS OF THE  
TRUE INVISIBLE EMPIRE,

Defendants.

**MEMORANDUM IN SUPPORT OF MOTION TO PERMIT FIELDS’ VIRTUAL  
ATTENDANCE AT TRIAL**

COMES NOW JAMES ALEX FIELDS, by and through Counsel, files this, his  
memorandum in support of his motion to permit Fields’ virtual trial attendance, and in support  
thereof, states as follows:

Defendant Fields is currently incarcerated at MCFP Springfield in Springfield, Missouri. Pursuant to this Court's Order of August 26, 2021, (Document No. 1033) counsel has communicated with Fields' case manager and IT representatives at USMCFP regarding measures to permit Fields' remote observation of trial and means of communication with counsel during trial. USMCFP personnel have been gracious and responsive. We are ironing out some additional details, and counsel has no reason to anticipate this remote participation will be prevented or delayed.

Due to the time constraints for filing this motion in this Court's Order and the ongoing nature of discussions, in an abundance of caution counsel asks this Court to Order only that USMCFP take any reasonable steps to permit Fields' observation of trial via VTC or some other government approved method and to permit Fields reasonable telephone communications with counsel during breaks at the trial of this case currently scheduled to begin October 25, 2021.

Respectfully submitted,

JAMES ALEX FIELDS, JR.

By Counsel

/S/  
\_\_\_\_\_  
David L. Campbell, Esquire (VSB #75960)  
DUANE, HAUCK, GRAVATT & CAMPBELL  
100 West Franklin Street  
Richmond, Virginia 23220  
Telephone: 804-644-7400  
Facsimile: 804-303-8911  
dcampbell@dhdglaw.com  
*Counsel for Defendant James A. Fields, Jr.*

CERTIFICATE OF SERVICE

I hereby certify that on 3<sup>rd</sup> day of September, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Robert T. Cahill, Esquire  
Cooley, LLP  
11951 Freedom Drive, 14<sup>th</sup> Floor  
Reston, Virginia 20190-5656  
*Counsel for Plaintiff*

Roberta A. Kaplan, Esquire  
Julie E. Fink, Esquire  
Christopher B. Greene  
Kaplan & Company, LLP  
350 Fifth Avenue, Suite 7110  
New York, New York 10118

Karen L. Dunn, Esquire  
William A. Isaacson, Esquire  
Boies Schiller Flexner LLP  
1401 New York Ave, NW  
Washington, DC 20005

Philip M. Bowman, Esquire  
Boies Schiller Flexner LLP  
575 Lexington Avenue  
New York, New York 10022

Alan Levine, Esquire  
Cooley LLP  
1114 Avenue of the Americas, 46<sup>th</sup> Floor  
New York, New York 10036

David E. Mills, Esquire  
Cooley LLP  
1299 Pennsylvania Avenue, NW  
Suite 700  
Washington, DC 20004

Kenneth D. Bynum, Esquire  
BYNUM & JENKINS, PLLC  
1010 Cameron Street  
Alexandria, VA 22314

Pleasant S. Brodnax, III, Esquire  
1701 Pennsylvania Ave., N.W.  
Washington, D.C. 20006

Bryan Jones, Esquire  
106 W. South St., Suite 211  
Charlottesville, VA 22902  
*Counsel for Defendants Michael Hill, Michael Tubbs, and  
Leagues of the South*

Elmer Woodard, Esquire  
5661 US Hwy 29  
Blairs, VA 24527

and

James E. Kolenich, Esquire  
9435 Waterstone Blvd. #140  
Cincinnati, OH 45249  
*Counsel for Defendants Schoepp, Nationalist Front,  
National Socialist Movement, Matthew Parrott, Matthew  
Heimbach, Robert Ray, Traditionalist Worker Party, Elliot  
Kline, Jason Kessler, Vanguard America, Nathan Damigo,  
Identity Europa, Inc., and Christopher Cantwell*

I further certify that on September 3, 2021, I also served the following non-ECF participants, via electronic mail as follows:

Christopher Cantwell  
[Christopher.cantwell@gmail.com](mailto:Christopher.cantwell@gmail.com)

Robert Azzmador Ray  
[azzmador@gmail.com](mailto:azzmador@gmail.com)

Elliott Kline  
[Eli.f.mosley@gmail.com](mailto:Eli.f.mosley@gmail.com)

Vanguard America c/o Dillon Hopper  
[Dillon\\_hopper@protonmail.com](mailto:Dillon_hopper@protonmail.com)

Matthew Heimbach  
[Matthew.w.heimbach@gmail.com](mailto:Matthew.w.heimbach@gmail.com)

Richard Spencer  
[richardbspencer@gmail.com](mailto:richardbspencer@gmail.com)

/S/  
\_\_\_\_\_  
David L. Campbell, Esquire (VSB #75960)  
DUANE, HAUCK, GRAVATT & CAMPBELL  
100 West Franklin Street  
Richmond, Virginia 23220  
Telephone: 804-644-7400  
Facsimile: 804-303-8911  
[dcampbell@dhdglaw.com](mailto:dcampbell@dhdglaw.com)  
*Counsel for Defendant James A. Fields, Jr.*